

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANTON PURISIMA,

PLAINTIFF,

VS.

PRESIDENT HU JINTAO, also known
as "CHIEF OF STATE OF CHINA,"
PREMIER WEN JIABAO, also known
as "HEAD OF STATE OF CHINA,"
JOHN DOE; JANE DOE,

DEFENDANTS.

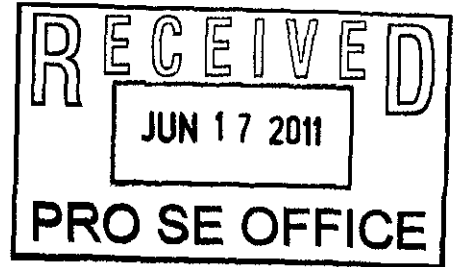
ORIGIN: GARAUFIS, J.

BLOOM, M.J.

VERIFIED COMPLAINT

JURY TRIAL DEMANDED

CASE #



I - PARTIES

1. PLAINTIFF ANTON PURISIMA, PRO SE, LEGAL MAILING ADDRESS AT C/O 516 SOUTH MAIN STREET, LOS ANGELES, CA. 90013; AND AT 390 9TH AVENUE, NEW YORK, NEW YORK 10001.

2. DEFENDANT ^{PRESIDENT} HU JINTAO, "HU JINTAO," also known as "CHIEF OF STATE OF CHINA" IS THE PRESIDENT OF CHINA, PEOPLE'S REPUBLIC OF CHINA, ALSO KNOWN AS CHIEF OF STATE OF CHINA, OWNER-MANAGER OF TIFFANY ENTERTAINMENT A BUS TICKET AGENT AND BUS COMPANY LOCATED AT 5516 8TH AVENUE, BROOKLYN, NEW YORK, U.S.A. TEL. # (718) 686-0740, DOING BUSINESS AS "ASIAN MARKETING" THROUGH HIS "AGENTS."

3. DEFENDANT PREMIER WEN JIABAO "WEN JIABAO," ALSO KNOWN AS HEAD OF STATE OF CHINA IS RESPONSIBLE AS OWNER-MANAGER OF "PRIVATE BUSINESS," DOING BUSINESS UNDER "ASIAN MARKETING" THE OWNER OF AGENT TIFFANY ENTERTAINMENT AND BUS COMPANY TIFFANY ENTERTAINMENT LOCATED AT 5516 8TH AVENUE, BROOKLYN, NEW YORK, U.S.A, TEL. # (718) 686-0740. DEFENDANT PREMIER WEN JIABAO WAS SUED UNDER JOHN DOE IN THE UNDERLYING CASE # 09-CV-3502 (NGG)(LB) FILED ON JUNE 18, 2009.

4. PLAINTIFFS JANE AND JOHN DOES WILL FILE THEIR OWN INDIVIDUAL CLAIMS BY THE TIME THESE PLAINTIFFS ARE NOTICED.

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5. THE TRUE NAMES AND CAPACITIES AND ADDRESSES ARE UNKNOWN TO PLAINTIFF ANTON PURISIMA, BUT BELIEVED DAMAGED BY ILLEGAL ACTS CONDUCTED BY DEFENDANTS HEREIN, AND DAMAGES ALLEGED. THESE UNNAMED PLAINTIFFS WILL FILE THEIR OWN INDIVIDUAL CLAIMS TO THE TIME THESE PLAINTIFFS ARE NOTICED.

6. THE TRUE NAMES AND CAPACITIES SUED AS DOES ARE UNKNOWN TO PLAINTIFF ANTON PURISIMA, BUT BELIEVED RESPONSIBLE FOR THE ACTS AND DAMAGES ALLEGED. PLAINTIFF ANTON PURISIMA BELIEVES AND THEREFORE ALLEGES THAT HE WILL AMEND THIS COMPLAINT BY THE TIME THESE UNNAMED DEFENDANTS ARE KNOWN TO HIM.

II - JURISDICTION

7. JURISDICTION OF THIS COURT IS BASED ON VIOLATION OF PLAINTIFF ANTON PURISIMA'S, AND THE UNNAMED PLAINTIFFS' RIGHTS PROTECTED BY UNITED STATES CONSTITUTION AS WELL AS BASED ON DIVERSITY OF CITIZENSHIP AND THE AMOUNT OF CONTROVERSY EXCEEDS THE SUM OF \$75,000.00 EXCLUSIVE OF INTEREST AND COSTS. ADDITIONALLY, THE JURISDICTION OF THIS COURT IS BASED ON VIOLATION OF PLAINTIFFS' RIGHTS PRESCRIBED BY SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK.

8. PLAINTIFF ANTON PURISIMA'S RIGHTS, AND THE PLAINTIFFS UNDER JANE AND JOHN DOES' RIGHTS HAS BEEN VIOLATED AS THEY WERE AND ARE CONTINUOUSLY DAMAGED BY DEFENDANTS HEREIN, DELIBERATELY EXCLUDED FROM PUBLIC ACCOMMODATIONS DEFINED BY SECTION 8-102 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK. PLAINTIFF ANTON PURISIMA, AND PLAINTIFFS UNDER JANE AND JOHN DOES WERE AND CONTINUOUSLY SUBJECTED TO DENIED SERVICES BY DEFENDANTS HEREIN, SUBJECTED TO DISCRIMINATION OF PUBLIC ACCOMMODATIONS IN VIOLATION OF SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK.

9. PLAINTIFF ANTON PURISIMA HEREBY INFORMS ALL PARTIES HEREIN THAT HIS RIGHTS AS A PERSON, AS AN AMERICAN, AS A RELIGIOUS PERSON, AS A MAN, AND AS "ANYTHING" HE CAN BE ARE PRICELESS TO HIM, TO HIS FAMILY, TO HIS COUNTRY, TO HIS DEPARTED PARENTS, TO HIS DEPARTED GRANDPARENTS, TO HIS FAMILIES IN HIS FATHER-SIDE, TO HIS RELATIVES, TO HIS FRIENDS, TO HIS FUTURE PARTNERS, TO HIS HONOR AS AN AMERICAN, TO HIS HONOR AS A MEMBER OF THE FAMILY IN HIS FATHER-SIDE, TO HIS REPUTATION AS LAW ABIDING CITIZEN, TO HIS BELIEFS, TO OTHERS THAT CAN POSSIBLY APPLY. THEREFORE, PLAINTIFF ANTON PURISIMA'S DAMAGES CONDUCTED AND CAUSED BY DEFENDANTS HEREIN, THERE IS NO AMOUNT OF MONEY

THAT CAN SATISFY THE DAMAGES TO PLAINTIFF DUE TO PLAINTIFF ANTON PURISIMA'S RIGHTS ARE "PRICELESS." THEREFORE, SINCE THERE IS NO AMOUNT OF MONEY THAT CAN SATISFY THE DAMAGES DONE BY DEFENDANTS HEREIN TO PLAINTIFF ANTON PURISIMA'S RIGHTS AN AN AMERICAN, HIS PERSON AS AN HONORABLE INDIVIDUAL, HIS NATIONAL ORIGIN INPLANTED BY HIS PARENTS, RELATIVES, GRANDPARENTS, HIS FAMILIES, HIS PROTECTED RIGHTS, AS WELL AS DAMAGES TO EVERY RIGHT THAT HE HAVE THAT HAS BEEN VIOLATED AND DAMAGED AND CONTINUOUSLY TO BE DAMAGED BY DEFENDANTS HEREIN.

ADDITIONALLY, THESE ACTS CONDUCTED BY DEFENDANTS HEREIN TOWARDS PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER JANE AND JOHN DOES WERE AND CONTINUING DISCRIMINATORY ACTS ARE IN VIOLATION OF TITLE VII AND TITLE VI OF THE CIVIL RIGHTS ACT OF 1964. TITLE VII PROHIBITS DISCRIMINATION BASED ON RACE, COLOR, NATIONAL ORIGIN, RELIGION, HARASSMENT,

ALSO PROHIBITS REPRISAL OR RETALIATION. DUE TO THESE ILLEGAL ACTS CONDUCTED BY DEFENDANTS HEREIN, PLAINTIFFS HAS BEEN DAMAGED AND CONTINUING TO THE PRESENT.

MOREOVER, THESE DISCRIMINATORY ACTS CONDUCTED BY DEFENDANTS HEREIN TOWARDS PLAINTIFF ANTON PURISIMA, AND PLAINTIFFS UNDER JANE AND JOHN DOES ARE IN VIOLATIONS OF "PUBLIC ACCOMMODATIONS" TITLE OF THE CIVIL RIGHTS ACT OF 1964, AND SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK.

DUE TO THESE ILLEGAL ACTS CONDUCTED BY DEFENDANTS HEREIN, PLAINTIFFS HAS BEEN DAMAGED AND CONTINUING TO THE PRESENT.

10. PLAINTIFF ANTON PURISIMA BELIEVES AND THEREFORE ALLEGES THAT PURSUANT TO "CREDIBLE" INFORMATION AND BELIEFS, ASIAN MARKETING, "ASIAN MARKETING TEAM" IS OWNED BY "CHINA," PEOPLE'S REPUBLIC OF CHINA. THEREFORE "TIFFANY ENTERTAINMENT" IS OWNED BY PEOPLE'S REPUBLIC OF CHINA, "CHINA."

11. PLAINTIFF ANTON PURISIMA ATTACHES EXHIBITS "ONE," "TWO," "THREE," AND EXHIBIT "FOUR," AND INCORPORATES THESE EXHIBITS TO EVERY PARAGRAPH AND CAUSE OF ACTION ALLEGED HEREIN, AND TO SUPPORT THEREOF.

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12. DEFENDANTS HEREIN SUBJECTED, AND DELIBERATELY DISCRIMINATED PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER DOES IN THE RECEIPT OF ITS SERVICES ON THE BASIS OF THEIR RACE, COLOR OF THEIR SKIN, THEIR NATIONAL ORIGIN, THEIR BELIEFS, DUE TO PLAINTIFFS HEREIN ARE NOT CHINESE, AND DOES NOT SPEAK CHINESE.

14. PLAINTIFF ANTON PURISIMA INCORPORATES CASE # 09-CV-3502 (NGG) (LB) BY REFERENCE AND TO SUPPORT THEREOF.

15. PLAINTIFF ANTON PURISIMA HAS PERFORMED ALL OBLIGATIONS TO DEFENDANTS' AGENT TIFFANY ENTERTAINMENT (RELATED CASE # 09-CV-3502 (NGG) (LB)) EXCEPT THOSE OBLIGATIONS PLAINTIFF ANTON PURISIMA WAS PREVENTED OR EXCUSED FROM PERFORMING.

16. PLAINTIFF ANTON PURISIMA INCORPORATES CASE # 09-CV-3502 (NGG) (LB) BY REFERENCE. ON OR ABOUT JUNE 13, 2009 AT 9:30 P.M., AND JUNE ¹⁴ 2009 AT 3:00 P.M. AND CONTINUING PLAINTIFF ANTON PURISIMA ^{AND PLAINTIFFS UNDER DOES} HAS BEEN DENIED ACCOMMODATIONS OF BUS TICKET PURCHASED (FULLY-PAID), BY DEFENDANTS HEREIN. DEFENDANTS DISCRIMINATED PLAINTIFF ANTON PURISIMA, AND PLAINTIFFS UNDER DOES DUE TO THE UNITED STATES OF AMERICA (U.S.A.) OWED MONEY OR INDEPTED TO CHINA A CREDITOR. HEREIN PURSUANT TO "CREDIBLE" SOURCES AND THROUGH INFORMATION AND BELIEFS THAT THESE DEFENDANTS UNDER DOES OR UNNAMED DEFENDANTS ACTED AS "AGENTS" AND UNDER-COVER-EMPLOYEE OF DEFENDANTS HEREIN. DEFENDANTS HEREIN ACTED AS "CREDITORS" OF THE UNITED STATES OF AMERICA (U.S.A.) THAT OWED MONEY FROM CHINA AS CREDITOR HEREIN. ADDITIONALLY, THROUGH INFORMATION AND BELIEFS CREDITOR ^{AND} OWNER CHINA IS BUYING BUSINESSES AND INVOLVED IN DOING BUSINESSES INSIDE UNITED STATES OF AMERICA (U.S.A.), SENDS MILLIONS OF CHINESE AGENTS IN "AMERICA" ACTED AS "STUDENTS, BUSINESSMEN/WOMEN EMPLOYEES, VISITORS, REPRESENTATIVES, ETC." CREDITOR ^{AND} OWNER CHINA, THROUGH INFORMATION AND BELIEFS OWNED BUSINESSES IN THE U.S.A. USING AND THROUGH COMPANIES FUNDED BY PEOPLE'S REPUBLIC OF CHINA, "CHINA."

AC/ THROUGH INFORMATION AND BELIEFS CREDITOR^{AND} OWNER CHINA
 HEREIN IS THE OWNER OF TIFFANY ENTERTAINMENT,
 DOING BUSINESS UNDER "ASIAN MARKETING TEAM," A
 DEFENDANT IN RELATED CASE # 09-CV-3502 (NGG) (LB),
 AC/ WHEREIN CREDITOR^{AND} OWNER CHINA WAS SUED AS UNDER "DOES"
 THEREIN.
 SEE: EXHIBITS "ONE," AND "TWO" TO INCORPORATE HEREIN AND TO
 SUPPORT THEREOF BY REFERENCE.

17. THIS CASE IS TIMELY FILED PURSUANT TO THE STATUTE
 OF LIMITATIONS WAS TOLLED BY THE FILING OF THE RELATED
 CASE # 09-CV-3502 (NGG) (LB) WHERE DEFENDANTS HEREIN WERE
 SUED AS UNDER "DOES," ON JUNE 18, 2009 DURING THE FILING OF
 THE RELATED CASE.

18. AS "WIDE-SPREAD-CAMPAIGN" BY CHINA "TO BE
 NUMBER ONE," THE AUTHORITIES IN CHINA CONFISCATED AND OR
 DISTROYED AMERICAN OWNED BUSINESSES IN CHINA, FURTHER CREATED
 HARDSHIPS TO AMERICAN CITIZENS AND THE U.S. GOVERNMENT.
 UNFAIRLY DEVALUED THEIR CHINESE CURRENCY FOR UNFAIR BUSINESS
 STRATEGICAL ADVANTAGE THAT INFLECT DAMAGES TO NON-CHINESE
 BUSINESSES THROUGHOUT THE WORLD. ON 2010, AT THE WHITE HOUSE
 DINNER THE CHINESE "SINGER," AND PRESIDENT OF CHINA HU JINTAO
 INCOURAGES THE SINGER THAT PLAYED THE "CHINESE FIGHT SONG."
 THESE ACTS INSULTED ALL AMERICANS AND THE U.S. GOVERNMENT.
 CHINESE OWNED BUSINESSES LIKE THE CHINESE BUS TICKET
 AGENT AND CHINESE BUS COMPANY "TIFFANY ENTERTAINMENT
 WHO IS RESPONSIBLE, AND AS CHINESE AGENT WHO IS RESPONSIBLE,
 WHO SOLD BUS TICKETS TO PLAINTIFF ANTON PURISIMA, AND TO
 PLAINTIFFS UNDER "DOES" DENIED PLAINTIFFS HEREIN THE BENEFITS
 AND SUBJECTED PLAINTIFFS TO DISCRIMINATION IN THE RECEIPT
 OF ITS SERVICES ON THE BASIS OF RACE, COLOR OF SKIN, PLAINTIFFS'
 AC/ NATIONAL ORIGIN, AND OTHER ILLEGAL DISCRIMINATORY ACTS CONDUCTED
 BY DEFENDANTS TO PLAINTIFFS HEREIN ARE IN VIOLATION OF TITLE VII,
 AND TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, AS PRESCRIBED
 THEREIN. ADDITIONALLY, THESE ILLEGAL ACTS BY DEFENDANTS HEREIN
 DISCRIMINATED PLAINTIFFS AND NON-CHINESE ON THE BASIS OF THEIR
 NATIONAL ORIGIN, BY REFUSING TO OFFER BUS TICKET (UNUSED) REFUNDS
 TO PLAINTIFF ANTON PURISIMA, AND TO NON-CHINESE PLAINTIFFS
 UNDER "DOES" AND BY SEATING PLAINTIFF ANTON PURISIMA AND NON-CHINESE
 IN THE REAR OF THE BUS, THUS DENYING PLAINTIFF ANTON PURISIMA AND

AND NON-CHINESE PLAINTIFFS UNDER "DOES" THE ADVANTAGES, FACILITIES AND PRIVILEGES OF A PUBLIC ACCOMMODATION. THESE ACTS BY DEFENDANTS HEREIN ARE IN VIOLATION OF SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK.

THESE ILLEGAL ACTS BY DEFENDANTS HEREIN TOWARDS PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER DOES CAUSED DAMAGES TO PLAINTIFFS HEREIN AND TO EVERY NON-CHINESE. DAMAGES THAT CANNOT BE MEASURED BY THE AMOUNT OF MONEY ALONE DUE TO PLAINTIFFS' RIGHTS ARE "PRICELESS" TO THEM.

PLAINTIFF ANTON PURISIMA INCORPORATES EXHIBITS "ONE," "TWO," "THREE," "FOUR" ATTACHED HERewith TO SUPPORT THEREOF. DEFENDANTS UNDER DOES "AS EMPLOYEES" OF CREDITOR-OWNER CHINA ACTED AS "AGENTS" OF DEFENDANT CHINA, PEOPLE'S REPUBLIC OF CHINA DISCRIMINATED PLAINTIFFS HEREIN ON OR ABOUT JUNE 13, 2009 AT 9:30 P.M., AND JUNE 14, 2009 AT 3:00 P.M. AND CONTINUING TO THE PRESENT, SUBJECTED PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER DOES TO DISCRIMINATION BECAUSE THEY ARE NOT CHINESE AND PLAINTIFFS HEREIN ARE CITIZENS OF UNITED STATES OF AMERICA. DEFENDANTS HEREIN DELIBERATELY ASSIGNED PLAINTIFF ANTON PURISIMA AND PLAINTIFFS "DOES" TO THE REAR OF THE BUS AND DISCRIMINATED AND SUBJECTED TO DISCRIMINATION TO DISCRIMINATION IN THE RECEIPT OF ITS SERVICES ON THE BASIS OF PLAINTIFFS' RACE, COLOR, NATIONAL ORIGIN, AND DUE TO PLAINTIFFS ARE NON-CHINESE.

MOREOVER, DEFENDANTS ACTS OF ASSIGNING SEATS TO PLAINTIFF ANTON PURISIMA AND PLAINTIFFS "DOES," AND OTHER NON-CHINESE IN THE REAR OF THE BUS BECAUSE "THEY ARE NOT CHINESE," EVEN THOUGH PLAINTIFFS AND OTHER NON-CHINESE ARE IN FRONT OF THE LINE, IN THE REAR OF THE BUS (DEFENDANTS' BUS) THAT IS BOUNCY-PART, "STINKY," "SMELLY," "DIRTY SEATS," "CLOSE TO DIRTY AND STINKY TOILET." ADDITIONALLY, THE STINKY SMELL IS COMPOUNDED BY CHINESE PASSENGERS WHO DOES NOT CLEAN-UP AND LEFT THE TOILET DOOR OPEN, AFTER USING IT. DEFENDANTS KNEW THAT PLAINTIFFS ARE NON-CHINESE AND AMERICANS BECAUSE OF THAT DEFENDANTS SHOWED ONLY CHINESE TELEVISION AND CHINESE MUSIC TO INSULT PLAINTIFFS AND NON-CHINESE AMERICANS, TREATED THEM LIKE DOGS AND CATS ON DEFENDANTS' BUSES. "CHINESE PASSENGERS DOES NOT GET IN LINE," CHINESE PASSENGER DOES NOT SAY "THANK YOU." PLAINTIFFS AND NON-CHINESE AMERICANS WERE TREATED LIKE DOGS AND CATS INSIDE DEFENDANTS' BUSES, THEY CANNOT COMPLAIN BECAUSE THE AMENITIES INSIDE DEFENDANTS' BUSES ARE ONLY FOR CHINESE. NON-CHINESE ARE NOT ALLOWED TO REMOVE THEIR SHOES, BUT CHINESE PASSENGERS WERE ALLOWED TO REMOVE THEIR "STINKY" SHOES AND PUT THEIR ONE-FOOT ON TOP OF THE SEAT."

THEY WERE AND ARE ASSIGNED SEATS

AMERICANS LIKE PLAINTIFFS HEREIN WERE AND ARE TREATED BY DEFENDANTS LIKE "SECOND-CLASS" PEOPLE LIKE SLAVES DUE TO THE UNITED STATES OF AMERICA OWED MONEY FROM CHINA. PLAINTIFFS HEREIN AND ALL AMERICANS HAS TO SUFFER, PENALIZED FOR BEING AN AMERICAN BY THESE DEFENDANTS DUE TO AMERICA OWED MONEY FROM CHINA. THROUGH CREDIBLE INFORMATION AND BELIEFS CREDITOR AND OWNER CHINA OWNED THOUSANDS OF BUSINESSES BIG AND SMALL

INSIDE UNITED STATES OF AMERICA AND THE OWNER OF TIFFANY ENTERTAINMENT, THE BUS TICKET AGENT AND BUS COMPANY.

THROUGH CREDIBLE INFORMATION AND BELIEFS, THEREFORE, PLAINTIFF ANTON PURISIMA ALLEGES THAT "A CHINESE INDIVIDUAL WHO SPEAKS ENGLISH - INFORMED PLAINTIFF ANTON PURISIMA THAT CHINA, USED TO BE A SLEEPING GIANT, BUT NOW, AN AWAKEN GIANT AND WANTS TO AVENGE THE COLONIZATION OF HONGKONG BY THE BRITISH, AND TAIWAN AS SUPPORTED BY UNITED STATES OF AMERICA.

BECAUSE OF THESE, ^{CHINA} WILL DO EVERYTHING IN ITS POWER EVEN IF ILLEGAL, TO DESTROY AMERICA. THEREFORE, PLAINTIFFS HEREIN AS AMERICANS WERE RETALIATED, SUBJECTED TO DISCRIMINATION IN THE RECEIPT OF ITS SERVICES BY DEFENDANTS HEREIN ON THE BASIS OF PLAINTIFFS' RACE, COLOR OF THEIR SKINS, PLAINTIFFS' NATIONAL ORIGIN, DUE TO PLAINTIFFS ARE NOT CHINESE, AND BECAUSE PLAINTIFFS HEREIN ARE AMERICANS. THESE ACTS BY DEFENDANTS HEREIN ARE IN VIOLATION OF CIVIL RIGHTS ACT, PROTECTED BY TITLE VI AND TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. ADDITIONALLY, THESE ACTS BY DEFENDANTS HEREIN ARE IN VIOLATION OF SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK. DUE TO THESE ILLEGAL ACTS PLAINTIFF ANTON PURISIMA HAS SUFFERED DAMAGES LEGALLY CAUSED BY DEFENDANTS'

HAS SUFFERED DAMAGES ECONOMICALLY, PHYSICALLY, PSYCHOLOGICALLY, DISCRIMINATORY ACTS, HARASSMENT, RETALIATION, BREACH OF THE AGREEMENT, FRAUD, CONSPIRACY TO DEFRAUD, INTENTIONAL TORT, DENIED OF PUBLIC ACCOMMODATIONS, DAMAGES TO PLAINTIFF.
ANTON PURISIMA'S HONOR, DAMAGES TO HIS RIGHTS AS AN AMERICAN,
DAMAGES TO HIS RIGHTS ALLEGED IN THE APPROXIMATE AMOUNT
OF \$300,000,000,000,000,000,000,000,000,000,000,000,000,000.00 (DECILLION DOLLARS)

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III-STATEMENT OF FACTS

19. ON OR ABOUT JUNE 13, 2009 AT 9:30 P.M., AND JUNE 14, 2009 AT 3:00 P.M., AND CONTINUING TO THE PRESENT PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER "DOES" HAS BEEN DENIED PUBLIC ACCOMMODATIONS OF BUS TICKET PURCHASED (TWO(2) BUS TICKETS FULLY-PAID) FOR HIMSELF AND FOR HIS FRIEND TO TRAVEL FROM NEW YORK TO FOXWOODS RESORT CASINO AND BACK TO NEW YORK. ONE (1) TICKET WAS USED, AND ONE (1) BUS TICKET UNUSED. DEFENDANTS HEREIN DENIED ACCESS TO BOARD DEFENDANTS' BUS TO PLAINTIFF ANTON PURISIMA'S FRIEND ON JUNE 13, 2009 DURING DEPARTURE TIME AND ON OR ABOUT JUNE 14, 2009 AT 3:00 P.M. AND CONTINUING TO THE PRESENT DEFENDANTS REFUSED TO REFUND TO PLAINTIFF ANTON PURISIMA'S UNUSED BUS TICKET DUE TO HE IS NOT CHINESE AND HIS FRIENDS ARE NON-CHINESE, AND DOES NOT SPEAK CHINESE, AND BECAUSE PLAINTIFFS ARE AMERICANS. ADDITIONALLY, DEFENDANTS' ASSIGNMENTS OF SEATS ON THEIR BUSES WERE AND ARE BASED ON THE COLOR OF THE SKINS OF THE PASSENGERS. CHINESE LOOKING AND CHINESE SPEAKING WILL HAVE SEATS IN FRONT AND BETTER SEATS, HOWEVER, PASSENGERS LIKE THE PLAINTIFF ANTON PURISIMA AND LATINOS, BLACKS OR AFRICAN AMERICANS, AND OR WHITES ARE ASSIGNED TO THE REAR OF THE BUS CLOSE TO THE "STINKY," AND "SMELLY," AND "DIRTY AND STINKY TOILET," AS WELL AS "DIRTY SEATS," ALSO "BOUNCY-PART" OF THE BUS. EVEN THOUGH PLAINTIFF ANTON PURISIMA AND PLAINTIFFS "DOES" AND OTHER NON-CHINESE WERE AND ARE THE THIRD(3) AND OR IN FRONT OF THE LINE, PLAINTIFF ANTON PURISIMA WAS GIVEN SEATS 49 AND 50 AND PLAINTIFFS "DOES" WERE AND ARE GIVEN SEATS IN THE REAR OF THE BUS, BECAUSE PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER "DOES" ARE NOT CHINESE, AND DUE TO THE ASSIGNMENT OF SEATS WAS AND IS BASED ON THE COLOR OF THE SKINS OF THE PASSENGERS. PLAINTIFF ANTON PURISIMA REQUESTED SEATS IN FRONT OR CLOSE TO FRONT ON THE BUS BUT PLAINTIFF ANTON PURISIMA WAS AND IS DENIED, AND CONTINUOUSLY DENIED TO THE PRESENT.

MOREOVER, DEFENDANTS HEREIN SHOWED ONLY CHINESE TELEVISION, AND ONLY CHINESE MUSIC ^{IN THEIR BUSES IN ORDER} TO DISCRIMINATE AND INSULT PLAINTIFF ANTON PURISIMA AND PLAINTIFFS UNDER DOES DUE TO THEY ARE NON-CHINESE AND BECAUSE THEY WERE AND ARE AMERICANS, AS

SEE: EXHIBITS 1-4 TO INCORPORATE HEREIN AND TO SUPPORT THEREOF BY REFERENCE.

ADDITIONALLY, THESE ACTS BY DEFENDANTS HEREIN ARE IN VIOLATION OF SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK.

DUE TO THESE ACTS BY DEFENDANTS HEREIN, PLAINTIFF ANTON PURISIMA HAS SUFFERED DAMAGES LEGALLY CAUSED BY DEFENDANTS' RETALIATORY ACTS AGAINST PLAINTIFFS, DISCRIMINATION, HARRASSMENT, FRAUD, CONSPIRACY TO DEFRAUD, INTENTIONAL TORT, BREACH OF THE AGREEMENT, AND OTHER DAMAGES AND CAUSE OF ACTION ALLEGED IN THE APPROXIMATE AMOUNT OF \$ 300,000,000,000,000,000,000,000,000,000.00 (THREE HUNDRED DECILLION DOLLARS).

20. DEFENDANTS ACTED WITH MALICE, FRAUD, AND OPPRESSION,
ENTITLING PLAINTIFF ANTON PURISIMA ^{AND PLAINTIFFS UNDER DOES} TO PUNITIVE DAMAGES,
AND EXEMPLARY DAMAGES. ACD

21. ON OR ABOUT JUNE 2010, THE AGENT-MANAGER OF DEFENDANTS HEREIN SENT A LETTER TO THE DISTRICT JUDGE, ADDRESSED AS: "DEAR JUDGE" ENUMERATING THEIR PROCEDURE AND POLICY IN CHINA. DICTATING TO THE HONORABLE JUDGE AS TO THE POLICY AND PROCEDURE IN CHINA THAT MUST BE FOLLOWED BY THE COURT SYSTEM HERE IN THE U.S. AND OR AN ATTEMPT TO CHANGE THE LAWS HERE IN THE U.S., BY SAYING:

"WE HOPE THAT OUR PROCEDURE AND POLICY WORKS."

SEE: EXHIBIT "ONE" ATTACHED HERewith AS REFERENCE.

THESE ACTS BY THE AGENT-MANAGER OF DEFENDANTS HEREIN IS AN INSULT TO PLAINTIFFS AND TO ALL AMERICANS, DISRESPECTED THE COURT SYSTEM OF THE UNITED STATES OF AMERICA. ADDITIONALLY, DEFENDANTS CONDUCTS HEREIN BY SENDING THE ILLEGAL LETTER TO THE HONORABLE JUDGE AND INDICATING THEIR POLICY AND PROCEDURE IN CHINA TO WORK HERE IN THE U. S. IS AN OUT-RIGHT DISRESPECT TO THE LAWS HERE IN UNITED STATES.

[illegible]

22. PLAINTIFF ANTON PURISIMA HEREIN ATTACHED A TRUE COPY OF THE LETTER FROM THE MANAGER EDDIE ZHENG OF TIFFANY ENTERTAINMENT, DATED: MARCH 17, 2010 ADDRESSED TO: "DEAR JUDGE"

SEE ATTACHED MARKED AS EXHIBIT "ONE" TO INCORPORATE HEREIN.

23. PLAINTIFF ANTON PURISIMA INCORPORATES A TRUE COPY OF SWORN STATEMENT OF NAFANG MO, OF TIFFANY ENTERTAINMENT SWORN ON SEPTEMBER 27, 2010, MARKED AS EXHIBIT "TWO"

24. PLAINTIFF ANTON PURISIMA INCORPORATES A TRUE COPY OF UNUSED BUS TICKET, FROM FOXWOODS RESORT CASINO, AND TIFFANY ENTERTAINMENT, (FULLY-PAID) SEAT #50 DATED: JUNE 13, 2009 MARKED AS EXHIBIT "THREE"

25. PLAINTIFF ANTON PURISIMA INCORPORATES A TRUE COPY OF USED BUS TICKET FROM: FOXWOODS RESORT CASINO, AND TIFFANY ENTERTAINMENT

ADDRESS: 5516 8TH AVENUE, BROOKLYN
PHONE: 718-686-0740
MARKED AS EXHIBIT "FOUR"

IV - CAUSE OF ACTION:

26. DISCRIMINATION; HARASSMENT; DISCRIMINATION TO NATIONAL ORIGIN; VIOLATION OF SECTION 8-107 OF THE ADMINISTRATIVE CODE OF THE CITY OF NEW YORK; RETALIATION; DENIED REFUND DUE TO RACE; DENIED PUBLIC ACCOMMODATIONS; SHOWING ONLY CHINESE TELEVISION DUE TO RACE AND RETALIATION; FRAUD; CONSPIRACY TO DEFRAUD; INTENTIONAL TORT; BREACH OF THE AGREEMENT; OTHERS; INJUNCTIVE RELIEF; PUNITIVE DAMAGES; EXEMPLARY DAMAGES; TITLES VI AND VII CIVIL RIGHTS ACT OF 1964 VIOLATIONS; ALIEN TORT CLAIMS ACT 28 U.S.C. § 1350. PLAINTIFF INCORPORATES PARAGRAPH I — 26 TO SUPPORT EVERY EXHIBIT CAUSE OF ACTION ALLEGED.

28. PLAINTIFF ANTON PURISIMA REQUESTS THIS HONORABLE COURT THAT THE FILING OF THIS CASE CONSTITUTES PRESERVATION OF ANY STATUTES OF LIMITATIONS FOR OTHER PLAINTIFFS OR INDIVIDUALS THAT HAS BEEN DAMAGED BY DEFENDANTS HEREIN.

29. PLAINTIFF ALLEGES DEFENDANTS' GUILTY OF MALICE, FRAUD, AND OPPRESSION, THEREFORE, PLAINTIFF SHOULD RECOVER, IN ADDITION TO ACTUAL DAMAGES TO MAKE AN EXAMPLE OF AND TO PUNISH DEFENDANTS.

30. PLAINTIFF ANTON PURISIMA HAS SUFFERED DAMAGES TO HIS RIGHTS AS AN AMERICAN, HAS SUFFERED DAMAGES TO HIS SACRED HONOR, DAMAGES TO HIS RIGHTS AS AN HONORABLE PERSON, DAMAGES TO HIS RIGHTS PROTECTED BY UNITED STATES CONSTITUTION; [ADDITIONALLY, DAMAGES TO PLAINTIFF'S NATIONAL ORIGIN WHEN THE ADMINISTRATION IN CHINA EXECUTED THREE (3) FILIPINOS (MOTHERS AND FATHER OF FILIPINO CHILDREN IN THE PHILIPPINES) ON OR ABOUT MAY 2010 WITHOUT DUE PROCESS OF LAW AND FOR JUST MINOR DRUG OFFENSES THESE THREE (3) FILIPINOS WERE EXECUTED. ALL THE WAY TO THE LAST DAY OF EXECUTION ON MAY 2010, ONE OF THE ACCUSED MOTHER "BEG FOR MERCY" THAT "SHE WAS INNOCENT AND THAT SHE WAS USED BY CRIMINALS IN CHINA WITHOUT HER KNOWLEDGE." THESE ACCUSED WERE VICTIMS, HOWEVER, STILL THE AUTHORITIES IN CHINA EXECUTED HER AND THE OTHER TWO WITHOUT DUE PROCESS OF LAW, AS THESE FILIPINOS LIKE THE PLAINTIFF WERE DENIED PROPER REPRESENTATION TO DEFEND THEMSELVES. PRESENTLY, THERE ARE APPROXIMATELY 350 FILIPINOS IN JAIL IN CHINA WAITING TO BE EXECUTED, FOR MINOR DRUG OFFENSES.] THESE RIGHTS ARE "PRICELESS" TO PLAINTIFF AS AN AMERICAN, THEREFORE, PLAINTIFF ANTON PURISIMA HAS BEEN DAMAGED BY DEFENDANTS' ACTS HEREIN LEGALLY CAUSED BY DISCRIMINATORY ACTS BY DEFENDANTS HEREIN, DISCRIMINATORY ACTS AS ALLEGED HEREIN IN THE APPROXIMATE AMOUNT OF \$ 300,000,000,000,000,000,000,000,000,000,000,000,000,000,000,000,000,000-³⁰⁰~~00~~ (DECILLION DOLLARS)

THUS, PLAINTIFF PRAYS FOR:

V - PRAYER:

- V - PRAYER:
1. DAMAGES IN THE APPROXIMATE AMOUNT OF THREE HUNDRED DECILLION DOLLARS (\$ 300,000,000,000,000,000,000,000,000,000,000.00)
2. EXEMPLARY DAMAGES; PUNITIVE DAMAGES.
3. COSTS OF SUIT INCLUDING ATTORNEY FEES.
4. IN-JUNCTIVE RELIEF.
5. SUCH OTHER RELIEF AS THE COURT DEEMS PROPER.

DATED: JUNE 17, 2011
NEW YORK, NEW YORK.

RESPECTFULLY SUBMITTED,

ANTON PURISIMA, PLAINTIFF PRO SE

= PAGE ELEVEN OF TWELVE =

VERIFICATION

THE MATTERS STATED IN VERIFIED COMPLAINT ARE TRUE EXCEPT THOSE MATTERS WHICH ARE STATED ON INFORMATION AND BELIEF AND AS TO THOSE MATTERS, I BELIEVE THEM TO BE TRUE.
I DECLARE UNDER PENALTY OF PER-JURY UNDER THE LAWS OF THE STATE OF NEW YORK THAT THE FOREGOING IS TRUE AND CORRECT.

DATED: JUNE 17, 2011.
NEW YORK, NEW YORK.

By: Anton Purisima
ANTON PURISIMA
PLAINTIFF, PRO SE

VI - DONATION:

31. PLAINTIFF ANTON PURISIMA, IS HEREBY DONATING FIFTY-EIGHT PERCENT (58 %) OF PROCEEDS OF HIS, THIS CASE TO HIS COUNTRY, THE UNITED STATES OF AMERICA (U.S.A.) AS AN ASSURANCE AND TO HELP GUARANTEE, PROTECT THE FUNDAMENTAL RIGHTS OF ALL AMERICANS, AND RESEARCH EXPENSES TO STRENGTHENED THE U.S. MILITARY. THEREFORE, PLAINTIFF ANTON PURISIMA REQUESTS THIS HONORABLE COURT THAT "HE IS DELEGATING THE BURDEN OF PROSECUTING 58 % OF SAID PROCEEDS HEREIN. THEREFORE, U.S. ATTORNEY'S OFFICE BE NOTIFIED UPON APPROVAL OF THE COURT HEREIN.

DATED: JUNE 17, 2011.
NEW YORK, NY.

RESPECTFULLY SUBMITTED,
Anton Purisima
ANTON PURISIMA
PLAINTIFF, PRO SE

32. PLAINTIFF ANTON PURISIMA, IS HEREBY DONATING TWELVE PERCENT (12%) TO THE PHILIPPINES (REPUBLIC OF THE PHILIPPINES) PROCEEDS OF HIS, THIS CASE TO HELP ITS PEOPLE AND VICTIMS' FAMILIES FROM THE CHINESE INJUSTICE, AND TO HELP EDUCATION AND MILITARY CAPABILITY WITH THE U.S. MILITARY.

DATED: JUNE 17, 2011.
NEW YORK, NEW YORK.

RESPECTFULLY SUBMITTED,
Anton Purisima
ANTON PURISIMA
PLAINTIFF, PRO SE

EXHIBIT "ONE"

REPLY
TIFFANY ENTERTAINMENT GROUP, INC.

March 17, 2010

Dear Judge,

We are a bus ticket agent that sells bus tickets to Foxwoods Casino under the Asian Marketing. Despite that we are under Asian Marketing Team, we welcome all other races to board our bus. There are 61 seats in a bus. This complaint said that he was assigned to seat 49 and 50, and those are not the last seats, there are also other passengers that sit further back, and those passengers include Chinese passengers too. Likewise, we have other races i.e. Americans, Spanish and Russian passengers that are eligible to get front seats.

Seats 1 to 30 are reserved for casino's Diamond Elite, Platinum and Gold card members, regardless of nationality and race. The office only carries tickets from seat 31 to 61, and they are sold on first come first serve basis. Furthermore, our ticket cost \$10 for round trip, and passengers will get back \$55 match play coupons and \$15 meal coupon from the casino. Due to such a good offer, our buses are full most of the time.

Our tickets are open for sale in office days before the departure. Thus, we told customers that once they purchase a ticket, the ticket is non-transferable and non-refundable. This is because once they purchased a ticket, that seat will be hold. This policy is printed on the ticket as well. Just like when someone buys a concert ticket, if they don't show up for the concert, they won't get their money back. The company is very straight about this policy. So the complaint said that he saw we refunded other passengers is definitely not true. We will only refund if the bus is cancelled due to inclement weather.

Our office and bus stop is located in Brooklyn Chinatown, therefore 98% of our passengers are Chinese. Due to the majority, the tour guide will broadcast Chinese movies in the bus. However, the tour guide will announce all the information including return time and departure gate in bilingual; Chinese and English.

In conclusion, we will not race any of our passengers. We value all our passengers as they are all our customers.

EXHIBIT "TWO"

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
ANTON PURISIMA,

Plaintiffs,

CASE NO.
CV-09-3502

-against-

TIFFANY ENTERTAINMENT, JOHN DOE, JANE DOE

ECF CASE

Defendant.
-----X

STATE OF NEW YORK)
COUNTY OF KINGS) S.S.:

I, NAFANG MO, being duly sworn, deposes and says that I am the President of the Defendant in the action herein and that I had the annexed Answer translated into Chinese (Cantonese) and know the contents thereof to be true to my own knowledge, except as to those matters therein which are stated to be alleged on information and belief and, as to those matters, I believe them to be true.

TIFFANY ENTERTAINMENT,


By: NAFANG MO, President

Sworn to before me this
27th day of September 2010


ROBERT N. LERNER
Notary Public, State of New York

No. 48922

Qualified in Kings County

Commission Expires April 13, 2011

EXHIBIT "THREE"



發財巴士票
ROUND TRIP
BUS TICKET

代理: 天地娛樂製作
TIFFANY ENTERTAINMENT

地址: 5516 八大道 布碌崙
(55 夾 56 街 8 大道 好運商場內)

Address: 5516 8 Avenue, Brooklyn

電話 PHONE: 718-686-0740

本公司有權保留所有更改或取消權利, 恕不另行通知。

* 持票人必須年滿 21 歲或以上, 不得退票、改票、轉讓或出售。逾期作廢。

* Age must be 21 and over. Non-transferable. Non-returnable.

回程車票 - 布碌崙

Brooklyn, NY
RETURN TICKET

日期
DATE JUN 13 2009

座位編號 Y: 50
SEAT NO.

巴士編號
BUS NO.

回程時間 4:45 AM

RETURN TIME

乘客必需提前 15 分鐘上車。

Passenger must board 15 minutes prior to return time

*** Only valid 7 days. ***

回程票 7 天有效期

COUPON

Bonus

日期
Date:

出發時間 9:30PM

Departure time:

MATCH PLAY

COUPONS

* 持票人必須年滿 21 歲或以上

* Age Must be 21 and over

憑此車票兌現賭場贈券

UNUSED
(FRONT PAGE)

EX. 3

UNUSED
(BACK PAGE)

EX. 3-1

**原班車乘客回程時必須提前15分鐘到達停車場等候上車，而最後5分鐘不上車之乘客，將作棄權論，座位將讓予其他後補乘客。

** Passenger must arrive at the bus gate 15 minutes prior to return time, or you will lost your seat. Seats are open to other standby passenger 5 minutes before return time.

Brooklyn
布碌崙



Foxwoods
康州快活大賭場

| 86街 86 th Street | Bay Parkway N 車站 | 十八大道 (福地酒家) 18 th Avenue | 八大道 8 th Avenue | |
|--------------------------------|---------------------|---|-------------------------------|----------------|
| 出發時間 Departure | | | | 回程時間 Return |
| 8:30am | 8:35am | 8:40am | 9:15am | 4:45pm |
| 9:30am | 9:35am | 9:40am | 10:15am | 5:45pm |
| | | | 11:30am | 7:15pm |
| | | | 8:30pm | 4:00am |
| | | | 9:30pm | 4:45am |

EXHIBIT "FOUR"



FOXWOODS

RESORT ♦ CASINO

康州快活大賭場

發財巴士票

ROUND TRIP

BUS TICKET

代理: 天地娛樂製作

TIFFANY ENTERTAINMENT

地址: 5516 八大道 布碌滿
(55夾56街8大道 好運商場內)

Address: 5516 8 Avenue, Brooklyn

電話 PHONE: 718-686-0740

本公司有權保留所有更改或取消權利，恕不另行通知。

* 持票人必須年滿21歲或以上，不得遺失、改票、轉讓或出賣。逾期作廢。

* Age must be 21 and over. Non-transferable. Non-returnable.

USED TICKET

EX. 4